



City of El Segundo

Planning & Building Safety Department

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CES-1

September 30, 2010

Mr. Cy R. Oggins, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

SUBJECT: Chevron Marine Terminal Lease Renewal Project Draft Environmental Impact Report

Dear Mr. Oggins:

Thank you for this opportunity to comment on the Chevron Marine Terminal Lease Renewal Project Public Draft Environmental Impact Report. The City of El Segundo Planning and Building Safety Department is submitting comments on behalf of the City and representing several Departments. The City's Planning Division and the Fire Department's Environmental Safety Division have the following comments:

- 1) Section 4.1 System Safety and Reliability.** It appears that the proposed mitigation measures in the draft EIR improve safety monitoring at the marine terminal facility through the use of new technology and regular inspection schedules. For example, the EIR identifies that a "smart pig" device has only been used on the pipeline for Berth 3B and not the other off-shore pipes of the facility. The regular use of this device on all off-shore pipelines should improve the pipeline inspection regime of the facility. Mitigation Measure MM SSR-2f requires smart pig inspections of pipelines be submitted within one year of lease renewal. However the mitigation does not seem to require smart pig inspection on a routine basis after the initial inspection. Will regular smart pigging occur? The City requests that MM SSR-2f be clarified to identify if future inspections are required and when they would occur.

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| 2) | Section 4.1 System Safety and Reliability. The City concurs that several of the proposed mitigation measures will improve system safety and reliability at the facility. These mitigations all require regular inspection and/or updating, as well as periodic reporting to appropriate regulatory authorities: SSR-1a (Inert Gas Systems and Fire Response), SSR-1b (Lease Modifications), SSR-2a (Pipeline Vacuum System), SSR-2b (Pressure Point Analysis System), SSR-2c (Testing of Spill Mitigation Equipment), SSR-2d (Pipeline Leak Detection), SSR-2j (Berm and Drainage at Onshore Marine Terminal) and SSR-2k (Pipeline Maintenance). The City of El Segundo concurs that the mitigation measures should be adopted with the Project. | CES-2 |
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| 3) | Section 4.7 Land Use, Planning and Recreation. Chevron has provided the City of El Segundo with a 3,600 square foot land lease donation on the Chevron Marine terminal property at the far northwest corner of the site adjacent to the public beach parking lot located in the City of Los Angeles. On May 27, 2010 the City approved locating a new two story 1,400 square foot lifeguard and public restroom facility at this location (City of El Segundo project numbers: Environmental Assessment 865, Conditional Use Permit 10-02, and Coastal Development Permit No. 10-01). The construction of the facility should be completed by summer 2011 and it will be staffed by the County of Los Angeles lifeguard service. Draft EIR Section 4.7 (Land Use, Planning and Recreation) should identify this permitted future facility in terms of the analysis of beach recreation, beach access, beach safety, and interactions of the proposed facility with the operation of the marine terminal. | CES-3 |
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| 4) | Section 4.7 Land Use, Planning and Recreation. Heavily used recreational beaches are located within close proximity of the berths of the marine terminal facility. The oil spill modeling diagrams contained in the document indicate that a major spill would reach shore in less than a day. Does the oil spill contingency plan or another spill protocol document contain requirements that the County of Los Angeles lifeguard service be notified in a timely manner in the event of a spill? Early notification could allow for early warning of beach users that potential hazardous materials are in the water and on the beach. This could be a potential mitigation for Impact LUPR-1 "Accidental Oil Releases Could Affect Recreational Activities." | CES-4 |
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| 5) | Section 4.7 Land Use, Planning and Recreation. The City concurs with the analysis in the Draft EIR document that the project is consistent with the zoning regulations of the El Segundo Municipal Code. | CES-5 |
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| 6) | Section 4.7 Land Use, Planning and Recreation. The City concurs with the analysis in the Draft EIR document that the project is consistent with the City of El Segundo General Plan Land Use and Hazardous Materials and Waste Management Elements. The analysis of the Open Space and Recreation | CES-6 |

Element should include discussion of the new lifeguard station and public restroom facility at El Segundo Beach.

- 7) **Section 4.7 Land Use, Planning and Recreation.** As stated in the Draft EIR the City has an adopted Local Coastal Program. This document was adopted by the City through Resolution No. 3005 on July 8, 1980. The California Coastal Commission certified the document on February 2, 1982. In general, the City concurs with the Coastal Plan consistency findings (pages 4.7-21 to 4-7.26) of the draft environmental document. However such discussion should include discussion of the approved lifeguard station and public restroom facility that is to be located in a lease area at the northwest corner of the Chevron Marine Terminal Facility.

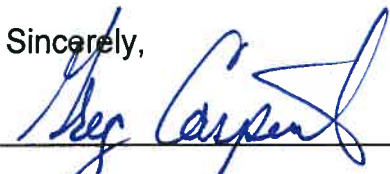
CES-7

- 8) **Environmental Safety Division Comments – General.** The overall response plan to spills should be revised to address any new information or resources available through Chevron and exercised accordingly. In addition, personnel responsible for marine operations should annually coordinate information, equipment resources and personnel with the El Segundo Fire Department to provide familiarity with the Chevron facilities and employees.

CES-8

Should you have any questions, please contact Masa Alkire, AICP, Principal Planner at (310) 524-2371.

Sincerely,



Greg Carpenter, Director
Planning and Building Safety Department

cc: Jack Wayt, City Manager
Mark Hensley, City Attorney
Karl Berger, Assistant City Attorney
Kevin Smith, Fire Chief
Steve Tsumura, Environmental Safety Manager
Jeff Robinson, Emergency Management Coordinator
Kimberly Christensen, AICP, Planning Manager
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